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# Bath and North East Somerset Placemaking Plan

## Participant Statement

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Matter 13: Bath's Universities

Prepared by Savills on behalf of Westmark (Bath)  
Ltd  
(Participant Reference Number 4797)

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## 1. Introduction

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This Statement has been prepared by Savills on behalf of Westmark (Bath) Ltd who have an interest in land at Upper Bristol Road / Windsor Bridge Road, Bath identified on the enclosed plan (**Appendix 1**). This site is referred to within the Bath and North East Somerset (BANES) Placemaking Plan as 'land within the North Bank'.

Representations have been submitted promoting the site throughout the Placemaking Plan process, particularly to the consultations on both the Options Document in January 2015, and the Pre-Submission Draft in February 2016. These set out in detail our objections to the Placemaking Plan, including concerns with the spatial strategy and the proposed allocation of the site for 'residential-led' development.

The contents of this Participant Statement supplement the representations previously submitted in 2015 and 2016, responding directly to the issues raised by the Inspector under Matter 13 of ID/3.

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## 2. Matter 13 – Bath’s Universities

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### Issue – whether the approach to Bath’s Universities is sound

Q1. The Strategic Housing Market Assessment upon which the CS is based assumes that the expected modest growth in the student population will be accommodated through on-campus provision (CS Policy B5). With this in mind; is it appropriate to review Section 2F of the adopted CS in isolation to general housing policies and the overall strategy for Bath?

In our view, it is fundamental that the Council’s evidence sets out the anticipated student growth along with a strategy for how such growth will be accommodated. It is clear from the evidence that the future growth in student population is expected to be more than ‘modest’ and will not be accommodated purely on campus and that off-campus accommodation within the city will therefore be required.

Indeed, Section 2F of Core Strategy states that *“The development of new academic space and student accommodation are matters that require policy direction in the Core Strategy. The Council is mindful that the growth in student numbers during the last decade has not been accompanied by sufficient on-campus study bedrooms and that the associated expansion of the student lettings market has diminished the ‘normal’ housing stock of the city”*.

Therefore, we strongly consider that, as a starting point, the Core Strategy, and particularly the strategy set within Section 2F, is now based on out of date evidence and is in need of review.

We do not consider it appropriate to review the need for student accommodation in isolation to the general housing policies and the overall strategy for Bath, and disagree with the Council’s approach on this matter. Indeed, as set out under our response to question 2 below, it is considered that there is a fundamental lack of evidence to support the Council’s approach to the provision of student accommodation. In particular, it is noted that the Strategic Housing Market Assessment was published in 2013 and is now out of date.

It is fundamental that the Council assesses the full objectively assessed housing needs for the city, and that this assessment includes the need for student accommodation as well as normal housing. Only by planning for the full needs of the city can the Council set a clear strategy for how the need will be met. This full updated evidence to support the Council’s strategy to student accommodation is currently absent from the Examination Core Document List.

Q2. Is the proposed strategy justified and supported by evidence?

We strongly object to the Council's approach to the provision of off-campus student accommodation, and consider that the Council has presented a fundamental lack of evidence to support the strategy proposed in the Placemaking Plan.

The Council's evidence base supporting the strategy for the delivery of student accommodation comprises:

- Student Numbers and Accommodation Requirements in Bath (2016);
- Housing Land Supply Findings Report (2016);
- The University Of Bath: Masterplan 2009-2020 (2009);
- University of Bath Environmental Development Capacity Report (2000)

The University of Bath Environmental Development Capacity Report was published in 2000, and is now significantly out of date. For example, the assessment of on-campus ecology will need to be updated regularly, and therefore the previous assumptions cannot be relied upon. Given how old this document is, we are not clear on the degree to which this document has been used to inform the strategy for on-campus accommodation, but would be concerned if the assumptions were being heavily relied upon.

Similarly, the University Of Bath: Masterplan 2009-2020 was published in 2009, and we would question whether this Masterplan now reflects the current position. Indeed, whilst the Masterplan does outline a strategy for the need for additional development on campus to accommodate future student growth this 2009 Report is also now out of date and based on past assumptions. The Masterplan itself recognises that it is difficult to predict the future growth in student numbers, however the Council should now have the benefit of student growth figures up to 2016, and a cautious approach should therefore be taken to any assumptions used in the 2009 Masterplan.

Furthermore, whilst the Masterplan aims to *"generate proposals which are not contingent on the acquisition of land outside the existing curtilage of the campus"*, this strategy is again based on assumptions made and an assessment of need undertaken over 6 years ago. As a result, this document cannot be relied upon in forming the strategy for the delivery of student accommodation to meet the current need.

It should be noted that the Council has not provided an up to date Strategic Housing Market Assessment with the submission of the Placemaking Plan and the Housing and Economic Land Availability Assessment (HELAA) will not be available until September 2016 at the earliest. This is concerning and demonstrates that the Council do not yet have the necessary evidence to support the strategy proposed within the Placemaking Plan. Indeed, we would question why participants in the examination should need to wait until the hearing sessions commence before having sight of this key piece of evidence.

The only recognition of the growing need for student accommodation in Bath is contained within the Student Numbers and Accommodation Requirements in Bath report, published in May 2016. Paragraph 2.31 of the Student Needs Report states that *"A revised additional demand figure of 4,578 is 2,238 more students in need than the 2,340 envisaged during the preparation of the Core Strategy as set out in paragraph 2.25"*.

This statement suggests that the evidence upon which the strategic policies of the Core Strategy are based is now out of date and the Council must now take into account the updated growth figures. In addition, whilst the May 2016 Report presents up to date information on student need, the report presents no solutions to this ongoing problem.

In this respect, the Draft Placemaking Plan states that, in relation to student need, *“their development requirements and aspirations form part of a whole suite of demands on a highly constrained city, which is relatively small as a host for two universities and which has a limited land supply for meeting all development needs in full”*.

Whilst we understand the tensions that exist between the need to deliver accommodation for both the growing student population alongside general housing, we do not consider that the draft Placemaking Plan policies are effective in addressing this balance. Rather than planning properly for the full objectively assessed need, the Council has decided to avoid assessing alternative options. Whilst we understand that Bath is subject to a number of policy constraints which impact on land availability, in our view the Council must do more to fully assess the alternatives and to take potentially difficult decisions to identify additional land for development.

Within our Statement submitted on behalf of Westmark (Bath) Ltd to Matter 12, we have outlined our evidence on the current student demand and supply. We do not propose to replicate the points raised within that Statement, but would reiterate that we are concerned that the Council is failing to plan for the current growing demand for student accommodation in Bath.

Overall, the Placemaking Plan has failed to reflect evidence provided within the 2016 Report and introduce any solutions to the ongoing problem and how to deliver sufficient student accommodation to meet the need. In this respect the proposed strategy is not effective nor supported by robust evidence.

*Q3. In the absence of off-campus provision for student accommodation, what impact are the recently revised growth aspirations of both the University of Bath and Bath Spa University likely to have on the objectively assessed needs for housing in Bath?*

Currently, the prospects of the identified need for student accommodation, set out in Student Numbers and Accommodation Requirements in Bath (2016), being delivered on campus at either Bath University or Bath Spa University is considered unachievable. However, by not having the necessary evidence available, the Council is failing to plan for this need by not identifying sufficient land to meet the need for both off campus student accommodation and normal housing. In particular, the Council's Housing Land Supply Findings Report, the Council's main Core Document for the supply of land, does not identify land for off-campus student accommodation both within the assessment and housing trajectory.

If the Council continues to fail to plan for the city wide need for student accommodation then the problems caused by the proliferation of HMO's will continue. This in turn will put increased pressure on the private sector rental markets as students will look to occupy the private sector housing stock due to lack of purpose built student accommodation in Bath. We are therefore concerned that the Council is failing to plan to address this problem.

*Q4. Will policies within the Placemaking Plan be effective in ensuring that any additional increase in need for student accommodation will not reduce the supply of general housing?*

Whilst we understand the tensions that exist between the need to deliver accommodation for both the growing student population alongside general housing, we do not consider that the draft Placemaking Plan policies are effective in addressing this balance.

Not only is the Council not fully planning for the anticipated growth in student population, but it has decided that the Placemaking Plan should set a blanket 'one size fits all' approach to the provision of student accommodation through Policy B5.

Within our previous representations, we have already objected to the approach taken in Policy B5 which provides no flexibility in circumstances where there are viability and deliverability issues surrounding non-student development on key allocated sites, and proposed amended wording accordingly.

In addition to the constraints put in place by Policy B5, we do not consider that Policy SB8 will provide sufficient flexibility to ensure that the land within the North Bank is redeveloped, utilising an important underused resource. As already outlined in our Statement to Matter 12, we strongly object to draft Policy SB8 which will not be effective. Overall, the Council should not be allocating sites for a single use (residential) which is not viable.

By not providing sufficient flexibility within the Placemaking Plan to enable the delivery of purpose built student accommodation in sustainable locations in the city, this will ultimately result in increased pressure on HMO's and the private letting sector. Rather than address the problem by recognising the important part played by purpose built student blocks in central parts of Bath, the Council continues to pursue a policy approach which will have the opposite effect to its intended outcome.

The Council recognises this problem within the Placemaking Plan District Wide Document where it is stated that *"The assessment of housing needs is based on two important assumptions. Firstly, the SHMA assumes that the expected modest growth in the student population at Bath's two universities will be accommodated in the planned growth of mainly on-campus new student accommodation. If the provision of purpose-built student accommodation does not keep up with the growth in the resident student population, more market housing will be needed because of the pressure on the private letting market"* (underlining our emphasis).

Despite recognising this problem, the Council has not proposed changes to the draft Plan to address this, instead deciding to concede that there is simply not enough land to accommodate all of the need, and therefore that a 'prioritisation of uses' must be adopted.

In our view this is not a sound approach. Instead for the policies of the Plan to be effective, the Council should be planning for purpose built off-campus accommodation to meet the need. The Plan must also ensure that the specific circumstances of individual sites are accounted for with sufficient flexibility within the policies. In this respect, Policy SB8 should be amended as suggest within our Statement to Matter 12.

Q5. Paragraph 17 of the CS confirms that the development of the University of Bath and Bath Spa University requires strategic policy direction in order to secure the future of each institution. Is the strategy contained in the Placemaking Plan in relation to student accommodation the most appropriate when considered against any reasonable alternatives? What alternative options have been considered to meet the more recent indications / aspirations of the universities?

As set out above in response to the other questions raised by the Inspector, the Placemaking Plan fails to set out any justification for the proposed approach to the provision of student accommodation. Instead, rather than seeking to meet the full objectively assessed need for student housing, the Council has simply stated that there is not enough land to accommodate all of the need, and therefore that a 'prioritisation of uses' in the city must be adopted.

The University Of Bath: Masterplan 2009-2020 outlined plans in 2009 to double the number of bedrooms on campus to *"relieve housing pressure in the city"*; consistent with the clear reference within the Council's Student Numbers and Accommodation Requirements in Bath report (2016) to the growing demand for student accommodation, not all of which can be accommodated on campus.

However, the concerns raised within the Council's own evidence base have not translated into an assessment of reasonable alternatives, particularly in relation to the strategy to off-campus student accommodation which will be required to assist the two universities in meeting the growing demand. It would appear that the Placemaking Plan proposes no solution to the problems expressed within the evidence, and simply seeks to rely on the delivery of on campus accommodation in the hope that this will solve the problem.

We consider that much uncertainty exists over the amount of accommodation which can be delivered on campus, a point which is recognised by The University Of Bath: Masterplan 2009-2020 which states that:

*“Most major capital projects on campus are funded from grants from the Higher Education Funding Council for England (HEFCE). The level of funding will depend on government policy at the time and there is currently an emphasis on the refurbishment of the existing building stock of UK universities rather than on the construction of new buildings”.*

Such alternatives must therefore be assessed before the approach to the delivery of student accommodation in Bath proposed in the Placemaking Plan can be found sound.

Q6. Are relevant policies positively prepared, effective and consistent with national policy?

For the reasons outlined in our response to the questions above, we do not consider that policies B5 and SB8 are positively prepared, effective and consistent with national policy.

It is considered that the lack of flexibility within Policy SB8 over the specific circumstances of the land within the North Bank, particularly the viability position, will result in barriers to sustainable development. Paragraph 173 of the NPPF is very clear that *“pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable”*. In excluding student accommodation as a potential future use, this provides for no flexibility to allow the site to progress given the viability concerns over residential development.

This lack of flexibility stems from Policy B5 which we continue to object to. We are concerned that Policy B5 provides no flexibility for the delivery of off-campus student accommodation on sites where it has been demonstrated that other competing uses, specifically residential, are found to be unviable and where development would be sustainable in all other respects.

It is considered that Policies B5 and SB8 therefore require careful consideration and modifications in order to ensure that they can be considered positively prepared, effective and consistent with national policy. This is likely to require the Council to commission new evidence and undertake an assessment of an alternative approach

Q7. Is there tension between Policy SB.19 and LCR5 in relation to the safeguarding of playing fields and recreational space?

N/A

Q8. Is the strategy sustainable over the plan period?

For the reasons provided throughout this Statement, our Statement to Matter 12, and our previous representations we strongly object to the approach taken by the Council to the delivery of student accommodation. In our view, the strategy proposed within the Placemaking Plan is not based on sound evidence or justification and is not sustainable over the plan period.

We do not see how ‘failing to plan’ for the full student need over the plan period can be deemed to be ‘sustainable’, and we are concerned that the Council continue to overlook the positive contribution off-campus accommodation can make to meeting these growing needs.

We recognise that the Council need to consider the balance between the need for both student accommodation and normal housing, however unless the Council plans properly for the full objectively assessed need then the strategy cannot be deemed sustainable in the long term. Despite seeking to ‘protect’ land within the city for

residential development, if the Council fails to plan for the growing student need, then the increasing pressure on the private rented market and loss of normal housing will continue to impact on the Council's ability to meet the need for normal housing in any case. We are therefore surprised that the Council has not fully assessed alternative options to address this problem.

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## 5. Conclusion

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In conclusion, we continue to object to the Council's approach to the delivery of student accommodation in Bath, and consider that there is a fundamental lack of evidence to support the approach taken.

Despite the Placemaking Plan and the Council's Student Numbers and Accommodation Requirements in Bath report making clear reference to the difficulties in accommodating the growing need for student accommodation, the draft policies in the Placemaking Plan propose no solution to address this ongoing problem. Evidence commissioned by Westmark (Bath) Ltd and attached at Appendix 2, confirms that the problem of delivering sufficient student accommodation has worsened since the adoption of the Core Strategy.

Instead, the Placemaking Plan places an emphasis on the Universities delivering the majority of the required student accommodation and continues to restrict off-campus student accommodation through Policy B5.

Through previous representations and this Statement, we have continued to object to the approach taken in Policy B5 which provides no flexibility for the delivery of off-campus student accommodation on sites where it has been demonstrated that other competing uses, specifically residential, are found to be unviable.

This approach is translated into Policy SB8 which covers the land within the North Bank, providing no flexibility to allow for a deliverable alternative to residential use, which is deemed unviable.

Overall, we object to the approach taken within the Placemaking Plan which is not justified and supported by evidence, and consider that the draft policies, particularly B5 and SB8 are not positively prepared, effective and consistent with national policy.

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# Appendix 1

## Site Location Plan

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Amendment	Date	KEY
A ISSUED FOR PLANNING	04/12/2015	<p>— Application Boundary</p> <p>--- Proposed layout being part of consented BREF extension</p>



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**PLANNING**

Amendment	Date	Application No.	Amendment
UPPER BRISTOL ROAD, BATH		1765/SU/001	A
SITE LOCATION PLAN		Scale: 1:2500 (1:2500 @ A3)	
AS EXISTING		Date: 27/11/2015	
		Drawn:	
Do not scale (except for plan @ 1:2500)		All dimensions to be checked on site	
Original printed on A3			